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October 14, 2022

VIA ECF

Hon. Lorna G. Schofield
U.S. District Court, Southern District of
New York
40 Foley Square, Courtroom 1106
New York, New York 10007

Re: *loanDepot.com, LLC v. CrossCountry Mortgage, LLC, et al.*, Case No.
1:22-cv-05971-LGS

Dear Judge Schofield:

Pursuant to the September 1, 2022 and September 30, 2022 Memo Endorsements (ECF Nos. 79, 100), the parties submit this joint status letter concerning expedited discovery and the briefing schedule for loanDepot's forthcoming motion for preliminary injunction.

On October 3, 2022, in response to expedited requests for production, the parties made initial document productions. After the productions were made, the parties identified alleged issues with the productions and have met and conferred on these issues multiple times. The parties continue to work toward supplementing their productions and resolving outstanding issues. The parties have also discussed potential limited depositions in advance of preliminary injunction briefing.

The parties' discussions regarding these issues are ongoing. The parties are committing, however, that by October 21, 2022, they will have completed their efforts to resolve the outstanding issues and will inform each other by that date when additional documents will be produced, so that they can confer on the remaining expedited discovery schedule and ask the Court to decide any unresolved disputes regarding expedited document discovery. In order to allow the parties to continue working through these issues, we respectfully request an extension until October 28, 2022 for the parties to propose a schedule for the remaining expedited discovery period and a briefing schedule for the motion for preliminary injunction.

The parties appreciate the Court's attention to this matter.

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Respectfully submitted,

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